

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants,

v.

VIRGINIA HOUSE OF DELEGATES, *et al.*,

Intervenor-Defendants

Civil Action No. 3:14-cv-00852-REP-
AWA-BMK

PLAINTIFFS' MOTION FOR CLARIFICATION REGARDING APRIL 13, 2020
ORDER [ECF NO. 421]

By Order dated April 13, 2020 (ECF No. 421), the Court directed Plaintiffs to “submit a calculation of their fee request using the Richmond, Virginia rate structure for the time periods involved.” In the interest of ensuring they provide the requested information in the format most useful to the Court, Plaintiffs file this motion seeking additional clarification.

In conjunction with their Memorandum in Support of Revised Second Motion for Attorneys’ Fees and Litigation Expenses (ECF No. 402), Plaintiffs submitted certain information regarding the “Richmond rates” they seek. This information includes the following:

- The Declaration of Kevin J. Hamilton (ECF No. 403), which included a table of timekeepers and the Richmond rates sought (*id.* ¶ 25) and Table A, which set out the requested annual increase in the Richmond rate sought by each timekeeper.
- Appendix A (ECF No. 402-1), which set out Plaintiffs’ daily fee entries in chronological order, including the Richmond rate for each timekeeper and the day-by-day value of each time entry at Richmond rates, and the total value of Plaintiffs’ fee request at the requested Richmond rate.
- Appendix B (ECF No. 402-2), which re-sorted the same fee entries by category of work (and then date), including the same Richmond rate data described above.

Plaintiffs understand that the Court seeks information about Plaintiffs’ requested Richmond rates additional to what Plaintiffs have previously submitted. To ensure that Plaintiffs accurately and helpfully respond to this directive, Plaintiffs respectfully seek additional clarification of the Court’s April 13, 2020, order.

DATED: April 14, 2020

By: /s/ Aria C. Branch

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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of April, 2020, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

By /s/ Aria C. Branch _____

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